

SPSO performance indicators for the Local Authority Model Complaints Handling Procedure

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Section 1 Monitoring performance

Purpose

Compliance with the local authority model Complaints Handling Procedure (model CHP) will be monitored by Audit Scotland in conjunction with the SPSO and in line with the principles of the Best Value Shared Risk Assessment (SRA) arrangements.

Local authorities are required to assess complaints handling performance to provide assurance in relation to their performance, to facilitate continuous improvement and to assist in benchmarking performance between local authorities.

This guide presents a suite of high level performance indicators against which local authorities should assess and monitor their complaints handling performance in relation to the requirements of the model CHP.

The indicators provide the minimum requirement for a local authority to self-assess and report on performance, and to undertake benchmarking activities. Local authorities may, however, develop and report additional performance indicators considered to be relevant to the services provided.

The SPSO's Complaints Standards Authority (CSA) developed these indicators in association with the Local Authority Complaints Handlers Network. By working together to develop a consistent set of performance indicators, the CSA hopes that all local authorities will be able to compare their complaints handling performance, building on their existing benchmarking arrangements. We very much appreciate the input of the Complaints Handlers Network.

Background: the model complaints handling procedures

The CSA has been working in partnership with each sector to develop model CHPs, and in March 2012 the Ombudsman published the Local Authority Model CHP. It is a requirement of The Public Services Reform (Scotland) Act 2010 for each local authority to have a CHP that is compliant with the model CHP within six months of its publication.

Following the development of the model CHP, the CSA has worked with the local authority Complaints Handlers Network to provide support in improving complaints handling. The development of these performance indicators relates to one area of this work.

Monitoring complaints information

The model CHP requires councils to record all complaints. This information helps to provide a clear basis for identifying service failures ('learning from complaints') and information on how effectively the organisation is handling complaints ('complaints performance'). The focus of the performance indicators is on complaints performance.

Self-Assessment

Currently, as part of the SRA process Audit Scotland (and relevant Local Area Network members) consider outputs of self-evaluation activities from Scotland's 32 councils; for example the *Public Service Improvement Framework (PSIF)*, *How Good is Our Council*, and the *European Foundation for Quality Management (EFQM) Excellence Model*.

Performance against the indicators contained in this guide should be reflected in council's self evaluation outputs and should be used to help identify areas for improvement. Compliance with the model CHP will be monitored by Audit Scotland in conjunction with the SPSO and in line with the principles of the SRA arrangements. Audit Scotland will ensure that audits, assessing the extent of compliance with the CHP, are undertaken using a proportionate and risk based approach.

Measuring complaints performance in context

The implementation of the model CHP by local authorities means that for the first time all councils are required to record, report and publish information on all the complaints they receive. This will provide significant opportunities for councils to identify service improvements from data that was previously unrecorded.

This may result in an increase in the number of complaints that are recorded by each council, particularly at the Frontline Resolution stage of the model CHP. This rise may continue for a period as the council beds in the new approach to complaints, and as all frontline staff become aware of the benefits of recording complaints to deliver service improvements. Such an increase in recorded complaints does not reflect any worsening of service performance; rather it is an indicator that the complaints procedure is more accessible, and the correct recording of data is more robust. However, once this bedding in process has been achieved, the number of complaints received will provide a measure of service delivery across the organisation, and changes in numbers may (particularly if they relate to specific service areas) indicate potential service failure issues.

It is important to take into consideration any contextual information when considering changes in complaints volumes. For example, the introduction of new services, policies or procedures may impact on existing services, or may generate feedback themselves. Equally, an increased focus on complaints internally may lead to improvements in complaints handling, with more complaints recorded. It is important, therefore, that organisations monitor changes in complaints volumes and critically analyse the reasons for these changes.

It is also important to note that, complex complaints that are investigated directly upon receipt without any attempt to achieve frontline resolution, are not included in those complaints 'escalated' from frontline resolution to investigation. This is particularly relevant for indicators 2, 3 and 4 where bodies will report on complaints escalated from frontline resolution to investigation, and on complaints investigated directly at the investigation stage of the CHP.

Closing complaints

In developing these performance indicators, it has become evident that practices may vary in relation to when a complaint is 'closed'. For clarity, a complaint can be closed as soon as the council has decided on the outcome of the complaint or decided on the appropriate action or made a decision and communicated this decision to the customer. There is no need to wait until any follow-up action has been taken to 'resolve' the underlying issue. For example, if a complaint is upheld and, as a result of this, a need for a repair is identified, the case can be closed before the repair has been completed. Good practice would recommend that the case is flagged to be checked in the future to ensure that the repair has been completed to the customer's satisfaction. But the complaint can be closed ahead of this.

Similarly, there is no need to wait for the customer to confirm whether or not they are satisfied with the response at the Frontline Resolution stage before the case is closed. Customers have up to six months to come back to the council if they are not happy with the decision at the Frontline Resolution stage. It is therefore not appropriate to hold a case open for a limited amount of time to see if the customer wishes to escalate the complaint to the Investigation stage.

It is important, therefore, for complaints recording systems to be able to re-open a case at the Investigation stage which has already been responded to and closed at the Frontline Resolution stage, or to be able to create a new case that links back to the original case in systems which do not have re-opening functionality.

Section 2 Complaints performance indicators

The indicators below provide a basis from which councils can monitor their complaints handling performance. Remember that one customer may raise one, or more complaints. Each complaint should be reported upon.

Indicator 1 **Complaints received per 1000 of population**

Indicator 1

The total number of complaints received per thousand population.

This indicator records the total number of complaints received by the council. This is the sum of the number of complaints received at stage one, (frontline resolution) and the number of complaints received directly at stage two (investigation).

In identifying the organisation's population councils should use the statistics produced by the National Records of Scotland (www.gro-scotland.gov.uk) which produces population estimates for each local authority. Midyear estimates should be used. For example, use 2011 midyear estimates (published on 31/05/12) for 2012/13 figures, and use 2012 midyear estimates (due to be published August 2013) for 2013/14 population estimates.

It is recognised that on occasions the population of some council's may rise beyond the estimates of the National Records of Scotland, for example at peak tourist times. This could potentially increase the number of complaints received. However, given additional factors such as varying social, economic, and demographic aspects of local authority areas this indicator is simply for use as an initial benchmark to enable further investigation and analysis to take place.

This is the only indicator where population per thousand is required. In all other indicators the definitions refer to complaints relating to all council services. For councils that retain housing stock, they will be required to report on similar indicators to the Scottish Housing Regulator under the Scottish Social Housing Charter on housing complaints. For clarity the complaints performance of council housing services should be included within the 'Local Government Complaints Performance Indicators' clearly explaining the proportion that relate to housing complaints.

Councils will record this information by service area. It is important that Indicator 1 reflects the total of all complaints received across all service areas of the council.

Indicator 2 **Closed complaints**

Indicator 2

Complaints closed at stage one and stage two as a percentage of all complaints closed.

The term “closed” refers to a complaint that has had a response sent to the customer and at the time no further action is required (regardless at which stage it is processed and whether any further escalation takes place). This indicator will report:

- the number of complaints closed at stage one as % all complaints
- the number of complaints closed at stage two as % all complaints
- the number of complaints closed at stage two after escalation as % all complaints

Indicator 3 **Complaints upheld, partially upheld and not upheld**

Indicator 3

The number of complaints upheld/partially upheld/not upheld at each stage as a percentage of complaints closed in full at each stage.

There is a requirement for a formal outcome (upheld, partially upheld or not upheld) to be recorded for each complaint. This indicator will report:

- the number of complaints upheld at stage one as % of all complaints closed at stage one
- the number of complaints not upheld at stage one as % of all complaints closed at stage one
- the number of complaints partially upheld at stage one as % of all complaints closed at stage one
- the number of complaints upheld at stage two as % of all complaints closed at stage two
- the number of complaints not upheld at stage two as % of all complaints closed at stage two
- the number of complaints partially upheld at stage two as % of all complaints closed at stage two
- the number of escalated complaints upheld at stage two as % of all escalated complaints closed at stage two
- the number of escalated complaints not upheld at stage two as % of all escalated complaints closed at stage two
- the number of escalated complaints partially upheld at stage two as % of all escalated complaints closed at stage two

Indicator 4 **Average times**

Indicator 4

The average time in working days for a full response to complaints at each stage.

Indicator 4 represents the average time in working days to close complaints at stage one and complaints stage two of the model CHP. This indicator will report:

- the average time in working days to respond to complaints at stage one
- the average time in working days to respond to complaints at stage two
- the average time in working days to respond to complaints after escalation

Indicator 5 **Performance against timescales**

Indicator 5

The number and percentage of complaints at each stage which were closed in full within the set timescales of 5 and 20 working days.

The model CHP requires complaints to be closed within 5 working days at stage one and 20 working days at stage two. This indicator will report:

- the number of complaints closed at stage one within 5 working days as % of total number of stage one complaints
- the number of complaints closed at stage two within 20 working days as % of total number of stage two complaints
- the number of escalated complaints closed within 20 working days as a % of total number of escalated stage two complaints

Indicator 6 **Number of cases where an extension is authorised**

Indicator 6

The number and percentage of complaints at each stage where an extension to the 5 or 20 working day timeline has been authorised.

The model CHP requires allows for an extension to the timescales to be authorised in certain circumstances. This indicator will report:

- the number of complaints closed at stage one where extension was authorised, as % all complaints at stage one
- number of complaints closed at stage two where extension was authorised, as % all complaints at stage two

Indicator 7 **Customer satisfaction**

Indicator 7

A statement to report customer satisfaction with the complaints service provided.

In assessing customer satisfaction with the complaints service, the quality outcomes the council may consider include:

- Access to the CHP
- The way in which they were treated by council staff, for example in relation to professionalism, friendliness, politeness, courtesy, communication style etc.
- Empathy, for example understanding the customer's perspective
- Doing what we said we would do, for example meeting timescales and providing updates
- The clarity of the decision and the basis for reaching that decision

Indicator 8 **Learning from complaints**

Indicator 8

A statement outlining changes or improvements to services or procedures as a result of the consideration of complaints.

This can be broken down into:

- How often reports go to senior management
- How often complaints outcomes, trends and actions taken are published together with a summary of information communicated to customers
- Number of services changed, improved or withdrawn as a result of complaints together with a description of the actions taken
- Action to reduce the risk of recurrence
- Action taken to ensure that staff members all learn from complaints.

Section 3 Additional support

The CSA

The CSA is working with the Local Authority Complaints Handlers Network to improve standards of complaints handling across the sector, and we are committed to providing ongoing support to local authorities as they further develop areas of good practice. This may be in the form of information and advice provided to the network group, the guidance that we develop and share via the Valuing Complaints website: **www.valuingcomplaints.org.uk** or through our online Forum hosted on that website which provides the opportunity to ask questions of the CSA and of other councils, and to learn from the experiences of others.

You may contact the CSA directly at **csa@spsso.org.uk**